

REMARKS

Claims 50-69 remain in this application, with claims 50, 52, 53, 58, 61, and 64 amended to correct clerical errors pointed out in the last office action. In addition, claims 51 and 57 have been amended to correct "topically organized information resource" to "integrated information resource," to more clearly point out the antecedent basis for the "information resource." Claim 50 has been further amended to include:

defining, in response to interaction with a network client, a defined topic consisting of one or more human-language words;
testing the defined topic to ensure that it is unique from any additional topics already defined within a memory of the server computer and that all of the human-language words making up the defined topic have a recognized meaning.

Claim 61 has been further amended to clarify that the defined topic is selected to be unique for the integrated information resource. Support for these amendments may be found, among other places, on page 19:10 - 20:17 of the application. By these amendments, no new matter has been added.

Claims 50, 52-53, 58, 61 and 64 were objected to as reciting "the posts," with correction to "the information posts" suggested. Claim 60 was objected to as lacking the word "of" between "plurality" and "links." These claims have been amended as suggested. These objections should therefore be withdrawn.

Claims 51 and 57 were rejected under 35 U.S.C. § 112, second paragraph, as lacking antecedent basis for the term "the topically organized information resource." These rejections are respectfully traversed. Claims 51 and 57 are amended to clarify that the referenced information resource in the "integrated information resource," for which antecedent basis is provided by claim 50. These rejections should therefore be withdrawn.

Claims 50-52, 55, 57, 59-61, 66, 68 and 69 stand rejected under 35 U.S.C. § 103(a) over McNaughton (App. No. 2006/0242583) in view of Kurzrok (U.S. 6,260,064); claims 53, 54, 56, 58, 62, 64-65 and 67 stand rejected under 35 U.S.C. § 103(a) over

McNaughton, Kurzrok, and Ginn (U.S. 6,275,811); and claim 63 stands rejected under 35 U.S.C. § 103(a) over McNaughton, Kurzrok, Ginn, and Dan (App. No. 2006/0149833). All of the foregoing rejections are respectfully traversed, as explained in more detail below.

First of all, contrary to paragraph 8 of the office action, McNaughton fails to disclose or suggest:

- defining, in response to interaction with a network client, a defined topic consisting of one or more human-language words;

- testing the defined topic to ensure that it is unique from any additional topics already defined within a memory of the server computer and that all of the human-language words making up the defined topic have a recognized meaning;

- serving the defined topic for discussion to a plurality of remote clients over the wide area network, identified as the defined topic for an integrated information resource;

- receiving information posts responsive to the defined topic from the plurality of remote clients;

- integrating the defined topic, the information posts, and a plurality of links to respective different remote information resources each containing information related to the defined topic, to provide the integrated information resource, the plurality of links being distinct from the information posts,;

as defined by claim 50. Instead, McNaughton discloses serving a "community client" to client workstations, configured to allow clients to exchange messages regarding web pages that are viewed by community members. ¶ [0031]. The community client enables users to exchange messages, to create or view comments, to chat, play games, and various other activities. ¶ [0034]. However, McNaughton fails to disclose that the community client, or any other object, integrates "the defined topic, the information posts, and a plurality of links to respective different remote information resources each containing information related to the defined topic, to provide the integrated information resource, the plurality of links being distinct from the information posts." The community client disclosed by McNaughton cannot read on the claimed integrated information resource, because it lacks all of the features defined by claim 50.

For example, McNaughton's community client lacks:

- **The defined topic.** The list of "subject or topic related headings (i.e. forum message threads) that a user may peruse" (§ [0036]) cannot read on "the defined topic" of claim 50, because the headings are plural within the community client, while the defined topic is singular. In addition, McNaughton fails to disclose that any of the message thread headings are tested "to ensure that it is unique from any additional topics already defined within a memory of the server computer and that all of the human-language words making up the defined topic have a recognized meaning," as claim 50 also requires. Likewise, the "particular Web page as identified by a URL" cannot read on the defined topic, because, among other things, the Web page or URL is also not subjected to the claimed testing process. Indeed, one of ordinary skill would clearly not be motivated to perform such testing on either the Web page or the URL, because such testing would be contrary to the expected function and use of both Web pages and URL's.
- **a plurality of links to respective different remote information resources each containing information related to the defined topic.** Basic principles of claim construction teach that, absent evidence in the specification to the contrary, different claim terms cannot be read on the same thing. Indeed, claim 50 specifically defines that these two features are distinct from one another. Therefore, the "annotations" described in paragraph [0036] cannot read on both "the information posts" and the "plurality of links . . ." for the simple reason that if the messages are read on the claimed "information posts," they cannot also be read on the "different remote information resources." It therefore follows that McNaughton's "list of subject or topic related headings" therefore cannot be read on the "plurality of links . . .", because McNaughton's headings link only to messages, which cannot be construed as both "information posts" and "different remote information resources." Moreover, McNaughton's Web page,

even if considered linked to from the community client (which is not conceded), cannot fulfill the “plurality of links” element. The “particular Web page identified by a URL” cannot possibly be the claimed “respective different remote information resources each containing information related to the defined topic.” The “particular Web page” is singular, not plural, and therefore cannot read on what is claimed.

McNaughton further fails to disclose or suggest:

Testing the defined topic to ensure that it is unique from any additional topics already defined within a memory of the server computer and that all of the human-language words making up the defined topic have a recognized meaning.

McNaughton fails to disclose or suggest any process for testing the defined topic to ensure that it is unique from any additional topics. McNaughton describes no process for testing topics for messages; apparently users can ascribe any topic or heading they like to a message or message thread. Likewise, McNaughton fails to disclose any process for ensuring that all of the words making up the defined topic have a recognized meaning. In addition, to the extent that a “Web page or URL” may be considered to read on a defined topic, if at all, the claimed testing is not disclosed by McNaughton, and moreover would be contrary to the expected function and use of both Web pages and URL's .

Kurzrok does not make up for these deficiencies of McNaughton. Kurzrok discloses “totaling ratings for articles and advertisements associated with a particular Web page,” and generating “a cumulative rating parameter representative of the popularity of the article.” Abstract. However, Kurzrok fails to disclose or suggest any process for defining a topic of discussion, or for testing a defined topic. Kurzrok therefore cannot make up for the deficiencies of McNaughton outlined above. The other references of record likewise do not make up for these deficiencies.

Failing to disclose all of the elements of independent claim 50, McNaughton and Kurzrok cannot bar its patentability under 35 U.S.C. § 103(a). The remaining claims are

also allowable, at least as depending from allowable claim 50.

The arguments presented herein are sufficient to fully traverse the rejections set forth in the Office Action. Therefore, Applicants have not presented all possible arguments, and may not have refuted the characterizations of either the claims or the prior art as may be found in the record. However, the lack of such arguments or refutations is not intended to waive such arguments or indicate concurrence with such characterizations.

In view of the foregoing, the Applicant respectfully submits that Claims 50-69 are in condition for allowance. Reconsideration and withdrawal of the rejections is respectfully requested, and a timely Notice of Allowability is solicited. If it would be helpful to placing this application in condition for allowance, the Applicant encourages the Examiner to contact the undersigned counsel and conduct a telephonic interview.

Respectfully submitted,

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